

October 20, 2021

CPUC Energy Division Tariff Unit
505 Van Ness Avenue
San Francisco, California 94102
EDTariffUnit@cpuc.ca.gov

**Re: Comments of the California Energy Storage Alliance to Resolution E-5165:
Approval, with Modifications, of Vehicle-to-Grid Implementation Plans and
Technical Requirements in Compliance with Decision 20-09-035**

Dear Sir or Madam:

Pursuant to the provisions of General Order 96-B, the California Energy Storage Alliance (“CESA”) hereby submits these comments to the above-referenced Draft Resolution E-5165 (“Draft Resolution”) issued on September 29, 2021, approving with modifications the Joint Advice Letter 3774-E of San Diego Gas and Electric Company (“SDG&E”), Advice Letter 4510-E of Southern California Edison Company (“SCE”), and Advice Letter 6209-E of Pacific Gas and Electric Company (“PG&E”), submitted on May 28, 2021 and pursuant to Decision (“D.”) 20-09-035.

I. INTRODUCTION & SUMMARY.

The Commission issued D.20-09-035 in September 2020, which adopted several of the Issue 23 sub-proposals focused on and clarified the Rule 21 interconnection pathways for vehicle-to-grid (“V2G”) direct current (“DC”) electric vehicle supply equipment (“EVSE”), along with a temporary pathway for Rule 21 interconnection for V2G alternate current (“AC”) resources until the appropriate standards are updated to address various gaps identified in the V2G AC Interconnection Sub-Group. The investor-owned utilities (“IOUs”) subsequently submitted implementation-related advice letters on May 28, 2021, which CESA protested to seek certain clarifications and to request key modifications for V2G DC EVSE and V2G AC pathways.

In light of these concerns, CESA is supportive of the conclusions and determinations made in Draft Resolution E-5165. CESA appreciates the helpful clarifications and affirmations regarding V2G DC EVSE interconnections and supports the Commission’s modifications that establishes more reasonable and less cost-prohibitive pathways for V2G AC pilot interconnections in the interim. Together, the IOUs’ modified proposal represents an important milestone to implement the V2G interconnection pathways in a way that facilitates efficient and reasonable

interconnections with V2G systems on a level playing field with stationary storage while ensuring safety and reliability.

II. COMMENTS.

In these brief comments, CESA expresses our support for some of the key changes made by the Draft Resolution and appreciates the IOUs' consideration of parties' comments.

1. The “model year” definition and grace period proposal are reasonable.

CESA appreciates the IOUs' proposal for a grace period for V2G DC EVSE installations, as well as the Commission's affirmations and clarifications, all of which are reasonable and recognize the unique considerations of EVSEs in supporting electric vehicle (“EV”) charging for off-grid use as its primary purpose. With the grace period defined and clarifications provided, CESA agrees that the proposal ensures that installed and interconnected V2G DC EVSEs are kept reasonably up-to-date with smart inverter requirements.

2. The clarifications around and streamlining efforts for direct-to-interconnection V2G DC EVSEs are helpful and necessary.

CESA agrees with the clarifications provided in the Draft Resolution to clarify that the UL Power Control Systems (“PCS”) Certificate Requirements Decision (“CRD”) is not required for V2G DC EVSEs that seek immediate Rule 21 interconnection requests. This clarification is particularly helpful given the ambiguity in D.20-09-035 and because it ensures that not all V2G DC EVSEs are required to follow a sequential process of connecting as unidirectional load-only resources that are V2G-capable, followed by bidirectional operations later upon proceeding through the Rule 21 interconnection process. Overall, CESA commends the Commission's smart consideration of different pathways and options for V2G DC EVSE interconnections, recognizing the development of EV Infrastructure Rules in R.18-12-006 and how customers and EVSE providers may have different needs to connect in a sequential process in some cases or connect in a streamlined interconnection process that accounts for load and generation characteristics in a consolidated process (like done with stationary storage in Rule 21) in other cases. To this end, CESA supports the Commission's direction to the IOUs to create a streamlined interconnection process at a future Interconnection Discussion Forum (“IDF”) meeting.

3. The trip scheme is a reasonable alternative to a secondary relay.

CESA agrees with the Draft Resolution's approval to use relays programmed to adhere to the Rule 21 requirements, along with PG&E's counterproposal to use a trip scheme in lieu of a secondary relay. As expressed in our protest, relay options are typically cost prohibitive such that the requirement for a secondary relay could make it very unlikely any V2G AC pilots would be able to interconnect under this temporary pathway. To this end, CESA supports this alternative option, as well as the Commission's directive for the IOUs' to consider power control system approaches if and when such options are available.

4. The V2G AC pilot project criteria are reasonable and appropriately allows for some flexibility to exceed limits.

CESA supports the Draft Resolution's approval of the IOUs' proposed V2G AC pilot criteria for this temporary interconnection pathway and appreciates the IOUs accommodating timeline extensions given some of the uncertainty in standards development and the regulatory process involved in Commission consideration of adopted standards for inclusion in Rule 21 tariffs and processes in support of a commercial interconnection pathway. In particular, the case-by-case approval of additional pilot projects beyond the six projects per IOU is appropriate and provides necessary flexibility to reflect evolving market conditions and policy landscape.

III. CONCLUSION.

CESA appreciates the opportunity to submit these comments to Draft Resolution E-5165 and looks forward to collaborating with the Commission and the IOUs.

Respectfully submitted,



Jin Noh
Policy Director
California Energy Storage Alliance

cc: Kristin Landry, Energy Division (Kristin.Landry@cpuc.ca.gov)
Justin Regnier, Energy Division (Justin.Regnier@cpuc.ca.gov)
Service lists R.17-07-007 and R.18-12-006